

Processing of Personal Data Policy

The present Processing of Personal Data Policy (further – Privacy Policy) was developed in accordance with the Constitution of the Russian Federation, Civil Code of the Russian Federation, Federal Law of 27 July 2006 №152-FA on Personal Data (further - Law), Federal Law of 27 July 2006 №149-FA on Information, Informational Technologies and the Protection of Information, Federal Law of 07 July 2003 №126-FA on Communications and other normative acts of the Russian Federation.

This Privacy Policy applies to all information that Media Agency LLC, the Website owner, can receive while the User is addressing the Website along with its services, programs and products.

1. TERMS AND DEFINITIONS

The present Privacy Policy includes the following terms:

- 1.1. **“Website Administrator (further — Administrator)”** — staff members, who are responsible for managing the website, acting on behalf of the “Media Agency” limited liability company (Further — Media Agency LLC), organising and (or) carrying out the personal data processing, as well as defining the purposes for data processing, the data needed to be processed, and the acts (operations) that will be performed.
- 1.2. **“Website”** — an internet resource that belongs to Media Agency LLC.
- 1.3. **“User’s personal data”** — any information related directly or indirectly to a specific or identifiable physical person (also referred to as a “subject of personal data” or “personal data subject”).
- 1.4. **“Personal data processing”** — any act (operation) or a set of acts (operations) performed with (or without) automation tools when handling personal data, including the personal data collection, recording, systematization, accumulation, storage, clarification (update, change), extraction, use, transfer (distribution, provision, access), depersonalization, blocking, deletion, and destruction.
- 1.5. **“Personal data confidentiality”** is a mandatory requirement to prevent dissemination of personal data without the consent of the personal data subject or other legal grounds, which is applicable to the person responsible for the personal data processing, or any other person, who has gained access to personal data.
- 1.6. **“Website User (further — User)”** — an individual, who accesses the website via the Internet and uses the website's services, pages and materials.
- 1.7. **“Cookies”** — a small piece of data created by a web server, which is further sent to a web browser or web client while the user is trying to open the corresponding website and then placed on the user’s computer.
- 1.8. **“IP-address”** is a network address that is unique to each host in the computer network built on the IP protocol suite.

2. GENERAL PROVISIONS

- 2.1. Addressing the Website by the User means the consent with the present Privacy Policy and the terms of the User's personal data processing.
- 2.2. In case of disagreement with the terms of this Privacy Policy, the User must stop using the Website and all the services it provides.
- 2.3. The present Privacy Policy applies only to this Website. The Administrator does not control and is not responsible for the third-party websites even if they are accessible through the Website links.
- 2.4. The Administrator does not verify the accuracy of the personal data provided by the User.

3. SUBJECT OF THE PRESENT PRIVACY POLICY

- 3.1. The present Privacy Policy sets out the Administrator's obligations for the non-disclosure and ensuring the privacy of personal data that the User provides voluntarily in the process of filling out the feedback form on the Website main page.
- 3.2. Personal data allowed for the processing within the present Privacy Policy is provided by the User by filling out the application form on the Website main page.

The specified form includes the following information:

- 3.2.1. The User's full name;
 - 3.2.2. The User's phone number;
 - 3.2.3. The User's email address;
 - 3.2.4. The User's approximate current whereabouts (determined by the IP data), accurate to the locality.
- 3.3. The Website protects data, which is automatically transmitted when the User is browsing the Website pages:
 - 3.3.1. IP address;
 - 3.3.2. information obtained by cookies;
 - 3.3.3. information about the browser (or other program that provides access to the Website);
 - 3.3.4. access time; address of the website page that the User has visited.
 - 3.4. If the User switches cookies off, it may lead to experiencing problems while accessing some parts or sections of the Website.
 - 3.5. The Website collects statistics on the visitors' IP addresses. This information is further used to identify and solve technical problems.
 - 3.6. Any other personal information, which is not specified above (visit history, browsers and operating systems being used, etc.) should be securely stored and

should not be proliferated with exception to the cases established by the clauses 5.2. and 5.3. of the present Privacy Policy.

4. PURPOSES OF COLLECTING USER'S PERSONAL DATA

- 4.1. The Administrator can use the User's personal data for the following purposes:
 - 4.1.1. Identification of the User who intends to apply for a club membership.
 - 4.1.2. Establishing feedback with the User, which includes sending notifications and requests regarding the Website usage, service provision, and the Users' feedback requests processing.
 - 4.1.3. Determination of the User's approximate whereabouts, accurate to the locality, to provide more complete information and services, ensure security, and prevent fraud.
 - 4.1.4. Confirmation of the User's personal data accuracy and completeness.
 - 4.1.5. Notifying the User about the extent of services and information materials provided on the Website.
 - 4.1.6. Resolving technical and organizational issues related to the registration process and the Website usage.
 - 4.1.7. Providing the User with effective customer and technical support in case of problems related to the Website usage.
 - 4.1.8. Providing special offers, data on the Website services, newsletters and other information on behalf of the Website with the consent of the User.
 - 4.1.9. Carrying out commercial activities with the consent of the User.
 - 4.1.10. Providing the User with access to the Website partners' websites or services in order to get their products, updates and services.

5. METHODS AND PERIOD OF THE PERSONAL DATA PROCESSING

- 5.1. The User's personal data is being processed within 3 years since it was initially provided and by any legal means, including processing through personal data information systems with or without automation tools.
- 5.2. The User agrees that the Administrator has the right to transmit personal data to any third parties, particularly to telecommunication operators, for providing the User with Website services solely.
- 5.3. The User's personal data can be transmitted to the authorized government agencies of the Russian Federation only on the grounds and in accordance with the procedure established by the law of the Russian Federation.
- 5.4. In case of the personal data loss or disclosure, the Administrator informs the User about the precedent.

- 5.5. The Administrator takes all the necessary organizational and technical measures to protect the User's personal data from unauthorized or accidental access, destruction, modification, blocking, copying, distribution, as well as from other illegal actions of any third parties.
- 5.6. The Administrator, together with the User, takes all necessary measures to prevent damage or other negative consequences caused by the User's personal data loss or disclosure.
- 5.7. When requesting for the feedback by filling out the application form on the Website main page, the User agrees that his personal data provided through the specified form will be available to the Website authorized representatives. The Administrator is responsible for the safety of personal data provided by the User through the application.

6. OBLIGATIONS OF THE PARTIES

- 6.1. User is obliged to:
 - 6.1.1. Provide personal data that is necessary to further use the Website.
 - 6.1.2. Update and complement the personal data in case of a change of the data provided before.
- 6.2. The Administrator is obliged to:
 - 6.2.1. Use the information received solely for the purposes established by the cl. 4 of the present Privacy Policy.
 - 6.2.2. Ensure the safe storage of confidential information and non-disclosure of the information transmitted by the User without prior written permission, as well as prevent selling, exchanging, publishing or disclose of the User's transferred personal data by other possible means with the exception of the cl. 5.2. and 5.3. of the present Privacy Policy.
 - 6.2.3. Take precautions to protect the User's personal data privacy in accordance with the procedure normally used to protect this kind of information in existing business transactions.
 - 6.2.4. Block or completely delete personal data related to the relevant User since a written request was received from the User or his legal representative or an authorized body responsible for the protection of data subject rights during the period of verification required in case of revealing inaccurate personal data or any illegal actions. The request for the complete data removal, change or blocking must be sent in a written form by mail or via email at admin@cpa.club. The Administrator has the right to request for the confirmation of the data that needs to be deleted, changed or blocked in order to identify and prove that this data belongs to the applicant.

7. RESPONSIBILITY OF THE PARTIES

- 7.1. The Administrator, who has not fulfilled his obligations, is liable for any documented damage caused to the User in view of the transmitted personal data

misuse, in accordance with the law of the Russian Federation, with the exception of cases established by the cl. 5.2., 5.3. and 7.2. of the present Privacy Policy.

7.2. In case of the Confidential Information loss or disclosure, the Administrator is not responsible for the consequences if the data:

7.2.1. Had been made public before it was lost or disclosed.

7.2.2. Had been received from any third party before it was received by the Administrator.

7.2.3. Was disclosed with the consent of the User.

8. SETTLEMENT OF DISPUTES

8.1. Prior to filing cases that arise from the relationship between the Website User and the Administrator with the Court, it is mandatory to submit a claim (a written proposal for a voluntary settlement of the dispute).

8.2. The recipient should notify the claimant about the outcome in a written form within 30 calendar days from the receipt of the claim.

8.3. When agreement cannot be reached, the dispute would be referred to a judicial authority in accordance with the current law of the Russian Federation.

8.4. The current law of the Russian Federation applies to the present Privacy Policy and the relationship between the User and the Administrator.

9. ADDITIONAL CONDITIONS

9.1. The Website Administrator has the right to amend the present Privacy Policy without the consent from the User.

9.2. The renewed Privacy Policy shall enter into force upon its publication on the Website, unless otherwise provided by the new edition of the Privacy Policy.

9.3. All suggestions or questions regarding the present Privacy Policy should be sent via email at admin@cpa.club.